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18 Attorneys for Plaintiff  
19 UNITED STATES OF AMERICA

20 UNITED STATES DISTRICT COURT

21 FOR THE CENTRAL DISTRICT OF CALIFORNIA

22 UNITED STATES OF AMERICA,

23 No. 2:18-CR-00172-GW-1, 6, 7, 8

24 Plaintiff,

25 THIRD STIPULATION REGARDING THE  
FILING OF RULE 29 AND 33 MOTIONS,  
THE HEARING ON POST-TRIAL MOTIONS,  
AND SENTENCING HEARING

v.

26 MICHAEL LERMA, et al.,

27 Defendants.

28 Plaintiff United States of America, by and through its counsel  
of record, the Acting United States Attorney for the Central District  
of California and Assistant United States Attorneys Kyle W. Kahan,  
Kellye Ng, and Jason A. Gorn; defendant Michael Lerma, by and through  
his counsel of record, Marri B. Derby and Joel M. Furman; defendant  
Carlos Gonzalez, by and through his counsel of record, Richard G.  
Novak and Kenneth M. Miller; defendant Jose Valencia Gonzalez, by and  
through his counsel of record, Shaun Khojayan and Daniel A. Nardoni;  
and defendant Juan Sanchez, by and through his counsel of record,  
Charles P. Diamond and Amy R. Lucas (collectively, "defendants"),

1 hereby stipulate to continue the briefing and hearing schedule  
2 regarding Rule 29 and 33 motions and the sentencing date based on the  
3 following facts:

4 1. On April 2, 2025, the Court issued an order setting the  
5 briefing deadline for defendants' Rule 29/33 motions to be due on  
6 July 28, 2025; oppositions due on August 25, 2025; replies due on  
7 September 15, 2025; and the hearing on October 16, 2025. (Dkt.  
8 1758.)

9 2. On July 18, 2025, the Court issued an order amending the  
10 briefing deadline for defendants' Rule 29/33 motions to be due on  
11 September 22, 2025; oppositions due on October 20, 2025; replies due  
12 on November 10, 2025; the hearing on the Rule 29/33 post-trial  
13 motions to be set for December 8, 2025; sentencing papers due on  
14 December 29, 2025; and the sentencing hearing to be set for January  
15 5, 2026, at 8:00 a.m. (Dkt. 1775.)

16 3. Between September 21 through 23, 2025, defendants filed  
17 their post-trial motions under Rule 29 and 33. (See Dkts. 1799,  
18 1800, 1801, 1802, 1803, 1804, 1810; see also Joinders at Dkt. 1805,  
19 1807, 1808, 1809.)

20 4. On October 14, 2025, counsel for the government conferred  
21 with defendants' counsel regarding an extension of time to respond to  
22 the defendants' post-trial motions. The defense does not oppose the  
23 government's first request for an extension of time and the parties  
24 stipulate to the following briefing and hearing schedule:

25 a. The government's deadline for its oppositions to the  
26 defense's post-trial motions under Rule 29 and 33 will be filed by  
27 November 3, 2025.

b. The defendants' deadline for their replies in support of their post-trial motions under Rule 29 and 33 will be filed by November 24, 2025.

c. The hearing on defendants' post-trial motions under Rule 29 and 33 will be on January 5, 2026, at 8:00 a.m.

5. On October 15, 2025, counsel for the government conferred with defendants' counsel regarding continuing the sentencing hearing. The defense does not oppose a continuance and the parties stipulate to the following briefing and hearing schedule:

a. The parties' sentencing briefing is due on January 15, 2026.

b. The sentencing hearing will be continued from January 5, 2026, to January 22, 2026, at 8:00 a.m.

IT IS SO STIPULATED.

Dated: October 16, 2025

Respectfully submitted,

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/s/  
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